

TITLE 326 AIR POLLUTION CONTROL BOARD

**DEVELOPMENT OF AMENDMENTS TO RULES CONCERNING PARTICULATE
MATTER EMISSION LIMITS FOR INDIANAPOLIS POWER AND LIGHT COMPANY
FACILITIES IN MARION COUNTY**

#95-016(APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from June 1, 1998, through June 30, 1998, on IDEM's draft rule language. IDEM received comments from the following parties:

Terry M. Hogan, Manager, Indianapolis Power and Light (IPL)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: It should be noted that Perry K Boilers 17 and 18 are oil-fired boilers and not coal-fired boilers.(IPL)

Response: The rule language has been changed to reflect this correction.

Comment: It should be noted that IPL requested the SIP revision to revise the PM emission limits for the individual Perry K boilers to provide greater operating flexibility without increasing overall particulate matter emissions.

Furthermore, IPL requested approval to bubble PM emissions from the three (3) stacks at Perry K Station and the one (1) stack at the Perry W Station in order to demonstrate compliance with the annual PM SIP emission limits. (IPL)

Response: The department acknowledges these comments and will note the reason for the request in the Fact Sheet at the time of preliminary adoption.

The original rulemaking was requested by IPL in 1995. Since that time the Perry W Station has been demolished and IPL has withdrawn its request for a bubble for the Perry K and Perry W stacks.

Comment: IPL has requested PM emission limits of 0.175 pound per million Btu per boiler for Boilers 11 and 12; 0.1 pound per million Btu per boiler for Boilers 13 and 14; 0.106 pound per million Btu for Boilers 15 and 16, and 0.015 pound per million Btu per boiler for Boilers 17 and 18. IPL requests that the Perry K short-term PM emission limits be specified in the rule for each boiler individually. Additionally, IPL requested that either the annual emission limits for the

Perry K facility be deleted or an annual emission limit be approved by IDEM for Boilers 11 through 18. (IPL)

Response: Since receipt of this comment, a permit application was submitted by IPL to the Environmental Resources Management Division (ERMD) for Boilers 11, 13, and 14, to convert these three (3) boilers to burn natural gas and coke oven gas. With this request, it was noted that emission limits for Boilers 11, 13, and 14 would be different than originally requested in 1995. These recently requested changes have been made so that the draft rule and permit application are consistent.

The emission limits have been listed in the rule individually, although three (3) of the limits are different as noted.

The department will allow IPL to take the three (3) emission limits in tons per year in the current SIP and add them together as one (1) total emission limit in order to provide operational flexibility for Perry W.

Comment: IPL requests that IDEM include a reference to the air quality dispersion modeling results provided by IPL to support the SIP revision request.(IPL)

Response: The department has noted receipt of this modeling in the Fact Sheet for the draft rule.

Comment: IPL requests that the emission limits for the Perry W Plant Units 17 and 18 be deleted from the rule since those units have been demolished. (IPL)

Response: IDEM agrees and the limits have been deleted from the draft rule.